



LAW OFFICE OF PARK
East-West Business Center, Suite 113
744 N. Marine Drive
Tumon, Guam 96913
Tel: (671) 647-1200
Fax: (671) 647-1211
Counsel for counterclaim-defendant PEOPLE HOLDINGS CO., LTD

**IN THE UNITED STATES
DISTRICT COURT OF GUAM
TERRITORY OF GUAM**

PEOPLE HOLDINGS CO., LTD.,)	Civil Case No. 03-00034
)	
Plaintiffs,)	
)	ANSWER TO COUNTERCLAIM
vs.)	
)	
SUN Y. WAKUGAWA, KOWON)	
SHIPPING CORP.,)	
Defendants.)	

ANSWER OF PLAINTIFF PEOPLE HOLDINGS CO., LTD. TO COUNTERCLAIM

COME NOW, Counterclaim Defendant PEOPLE HOLDINGS CO., LTD, by and through their attorney of record, Mun Su Park, Esq., of the Law Office of Park, and hereby files its answer to the Counterclaim as follows:

1. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations contained in Paragraph A.
2. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations contained in Paragraph B.
3. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations contained in Paragraph C.
4. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations contained in Paragraph D.
5. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations contained in Paragraph E.
6. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations contained in Paragraph F.

ORIGINAL

1 7. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations
2 contained in Paragraph G.

3 8. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations
4 contained in Paragraph H.

5 9. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
6 contained in Paragraph I.

7 10. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations
8 contained in Paragraph J.

9 11. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
10 contained in Paragraph K.

11 12. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
12 contained in Paragraph L.

13 13. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD admit to the allegations
14 contained in Paragraph M.

15 14. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
16 contained in Paragraph N.

17 15. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
18 contained in Paragraph O

19 16. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
20 contained in Paragraph P.

21 17. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
22 contained in Paragraph Q.

23 18. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
24 contained in Paragraph R.

25 19. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
26 contained in Paragraph S.

27 20. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
28 contained in Paragraph U.

1
2 21. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
3 contained in Paragraph V.

4 22. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
5 contained in Paragraph W.

6 23. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD deny to the allegations
7 contained in Paragraph X.

8 **AFFIRMATIVE DEFENSES**

9 24 Counterclaim Defendant PEOPLE HOLDINGS CO., LTD allege that the cause of
10 action set forth in Counterclaim fails to state accurate facts sufficient to any cause of action against
11 Counterclaim-Defendant.

12 25. Counterclaim-defendant PEOPLE HOLDINGS CO., LTD allege that counterclaim-
13 plaintiffs are barred from enacting any cause of action against the counterclaim-defendants, as
14 counterclaim-plaintiffs have failed to provide consideration.

15 26. Counterclaim Defendant PEOPLE HOLDINGS CO., LTD allege that counterclaim-
16 plaintiff is barred from enacting any cause of action against Counterclaim Defendant because
17 Counterclaim-plaintiffs have unclean hands.

18 WHEREFORE, counterclaim-defendant pray as follows:

- 19 1. That counterclaim-plaintiffs takes nothing from their counterclaim;
20 2. A judgment of dismissal be entered in favor of counterclaim-defendant;
21 3. Counterclaim-defendant be awarded the costs of suit incurred; and
22 4. counterclaim-defendant be awarded for such other and further relief as the court
23 deems proper.

24 **Respectfully** submitted this 16th day of December, 2003.

25
26 **Law Office Of Park**

27 By: 

MUN SU PARK, ESQ

Attorney for counterclaim-defendant